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December 22, 2004

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: December 2004 Early Action Progress Report

Dear Mr. Palmer:

South Carolina Early Action Compacts identify "key" milestones that are required for the continued deferral of the effective date of nonattainment designations and also milestones that track the progress being made by the state and local areas toward adoption and implementation of emission reduction measures. This correspondence identifies the progress made by South Carolina and participating areas since the June 2004 submittal. Enclosure 1 includes the December 2004 Progress Report for each participating county, grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

In addition to the progress indicated by each county on the enclosed reports, the South Carolina Department of Health and Environmental Control (Department) continues to be involved with the counties in a number of other projects that benefit air quality. A few of these include landscaping projects; gas can exchange events, the Advanced Travel Center (Truckstop Electrification (ATE) project, and radio public service announcements. Details of these are included on the enclosed reports and/or the Early Action State Implementation submittal.

The Department also continues to be an active partner in the *Sustainable Environment for Quality of Life* (SEQL) project. As a part of the SEQL project, the Catawba Council of Government (COG) partnered with the Department and other stakeholder groups to compile sample ordinance language, policies, best management practices (BMPs) and program guidance for the development and implementation of SEQL action items geared to the local governments within the SEQL project area. This information should prove helpful to local governments in their 8-hour ozone early action efforts. Earlier this month, a CD with these documents was provided to all participating areas. The information will also be available on the Department's website.

As stated in the March 2004 submittal, both the 2007 future year modeling emissions inventory and the attainment maintenance analysis have been completed. Information regarding these two Early Action Compact (EAC) milestones, as well as information regarding the modeled control cases will be addressed in the Early Action State Implementation Plan (SIP) submittal due December 31, 2004.

Local stakeholder groups continue to meet and upon request the Department attends as many of these meetings as possible to offer technical assistance and updates regarding the 8-hour ozone standard and the early action process.

Upon publication in the June 25th issue of the *State Register*, the EAC regulations became effective. Regulation 61-62.5, Standard 5.2, Control of Oxides of Nitrogen is a newly developed regulation that targets new stationary sources of NO_x emissions and requires controls equivalent to Best Available Control Technology (BACT). The sources affected by this regulation (≥ 10 mmBTU/hr heat input) are generally those smaller sources that are exempt from BACT because they fall below the emission thresholds. The regulation also requires existing sources that replace their burners to replace them with a low NO_x burner.

Regulation 61-62.2, Prohibition of Open Burning was revised to prohibit construction waste from being burned. However, the Department allowed an exemption from the ban for single or two family residential construction waste provided that it is burned outside of the ozone season. In addition, the Open Burning regulation was revised to prohibit the burning of household trash. Under the old regulation, household trash could be burned if other disposal services did not exist.

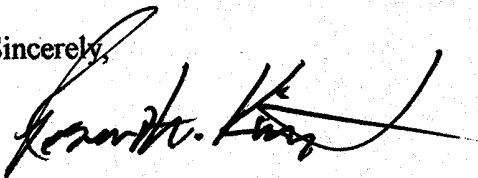
The Department continues to work with the largest existing industrial sources in the more vulnerable areas of South Carolina to reduce NO_x emissions. Detailed information regarding the specific facilities and the respective reductions will be included in South Carolina's Early Action SIP submittal, December 2004.

The Department held a public meeting on the Early Action SIP submittal on August 18, 2004. The meeting was held in Columbia and broadcast around the state at local Department Environmental Quality Control offices to allow participation from all over the state. The Draft Early Action SIP was published in the *State Register* on October 22, 2004, and the public hearing was held on November 22, 2004. As deemed appropriate, based on comments presented during the public comment period, the Department is incorporating changes to the Draft Early Action SIP to be submitted to EPA by December 31, 2004.

The early action process continues to be a positive experience for South Carolina and has provided an increased awareness of air quality issues. As a result, awareness of air quality issues has been raised to a level that would not have been possible without the EAC process and local agencies and other entities are taking ownership of air quality activities and initiatives. This is perhaps, above all else, the reason why the South Carolina Wildlife Federation chose to honor the "SCDHEC Early Action SIP" with their 2005 South Carolina Wildlife Federation Award, an award that has only been bestowed six times since 1970.

Thank you for the continued assistance and support EPA has provided in this process. We look forward to continuing to work with EPA and other stakeholders as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Myra Reece, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosure: December 2004 Progress Reports for Participating Areas

cc: Kay Prince, EPA Region 4
County Officials (no attachments*)
Ron Methier, GA Dept. of Natural Resources (no attachments*)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
Myra Reece, BAQ (no attachments*)
Renee Shealy, BAQ (no attachments*)
EQC District Directors (no attachments*)

*All those not receiving attachments will be notified when materials are placed on website.